

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

)
Priorities for Future Data)
Collection and Analytical Work)
Relating to Periodic Reporting)

Docket No. RM2011-3

PUBLIC REPRESENTATIVE SUGGESTED DISCUSSION
TOPICS FOR TECHNICAL CONFERENCE

(August 2, 2012)

On May 25, 2012, the Postal Service filed a Scoping Study in Response to Chairman's Information Request No. 2.¹ On June 27, 2012, the Commission issued an order scheduling a technical conference on August 15, 2012.² The purpose of the technical conference is "to review and discuss the tentative conclusions and recommendations contained in the Scoping Study and to be briefed by the Postal Service on the progress that it has made toward the objective of updating the city carrier street time variability study since the Scoping Study was prepared." *Id.* at 1. The Public Representative appreciates the Postal Service sharing its Scoping Study with the public as it attempts to address many areas of concern with respect to updating the City Carrier Street Time Study (CCSTS). The Public Representative believes that the Postal Service's Scoping Study is a good first step toward updating the current CCSTS. However, the Scoping Study raises questions regarding this potential update attempt. The Public Representative believes that it is in everyone's best interest to address as

¹ Scoping Study Report of the United States Postal Service, May 25, 2012 (Scoping Study); see also Notice of Filing of Report in Response to Chairman's Information Request No. 2, May 30, 2012.

² Order No. 1385 - Order Scheduling Second Technical Conference, June 27, 2012 (Order 1385).

many of these issues as possible before the Postal Service expends significant resources on updating the CCSTS.

Toward that end, the Public Representative has put together the attached proposed discussion topics for consideration at the Commission's upcoming August 15, 2012 Technical Conference. The Public Representative believes that providing these proposed discussion topics publically, prior to the Technical Conference, may lead to a more productive conference.

While it would be procedurally appropriate for the Public Representative to bring up these topics at the Technical Conference without filing the attached proposed discussion topics, the Public Representative believes that more meaningful discussion on these topics may require some additional preparation.

The Public Representative is optimistic that the Postal Service will be in a good position to discuss these topics at the Technical Conference. It may be, however, that the Postal Service is not yet in a position to address many of these identified topics. The Public Representative's intention is not to require the Postal Service to put the cart before the horse; rather, the Public Representative seeks to ensure that the Postal Service consider these issues as its analysis progresses. The goal is to ensure that the Postal Service is able to incorporate these important issues in the CCSTS before going too far down that road. If the Postal Service or the Commission does not believe that the upcoming Technical Conference is the appropriate forum for the Postal Service to address these topics, the Public Representative is hopeful that either the Commission or the Postal Service will be willing to address them in the near future.

Respectfully Submitted,

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Proposed Discussion Topics

1. FSS-Related Data.

- Has the Postal Service considered whether there are sufficient data so that any FSS-related results would be reliable and generalizable to the entire carrier network?¹ Although the multi-year Form 3999 database is large, the route data may have been collected for periods when the FSS was not fully deployed or only fully deployed in limited areas or ZIP codes.

2. Data Updates.

- What are the Postal Services current expectations for the Form 3999 database being a long-term source for future updates of the city delivery street time variability estimates? The variation in the number of route evaluations from year-to-year may raise concerns about future updates and the generalizability of the data input into an operational database. Compliance with the requirements for completing Form 3999 appears to vary significantly across the carrier delivery network.²

3. Data Quality Issues.

- The Postal Service identified refinements in the DOIS related to the End of Run (EOR) interface and the TACS interface. It reports DOIS should not have zero time or zero volume values for routes on a regular delivery day (unless there was a system breakdown or user neglect).³ Do these

¹ The Postal Service stated that the “[u]se of the Flats Sequencing System (FSS) is expanding but flats sequencing is performed for only a minority of ZIP Codes. When the FSS is in use, it creates an additional container or bundle of mail that must be handled by the carrier. This is not a problem for motorized routes, but can cause additional work for foot and park and loop routes. This suggests that future delivery time models should explicitly account for the street time caused by FSS when it is present, perhaps as including FSS mail as a separate variable.” Scoping Study at 4.

² In a recent City Delivery – Street Efficiency Report in the San Diego District, the Postal Service’s Office of the Inspector General found that “[s]upervisors are required to complete a PS Form 3999 at least annually.” See United States Postal Service Office of Inspector General, City Delivery-Street Efficiency San Diego District Audit Report, Report Number DR-AR-12-001, June 5, 2012, at 6 *available at* http://www.uspsoig.gov/foia_files/DR-AR-12-001.pdf.

³ Responses of The United States Postal Service to Questions 1-3 of Chairman’s Information Request No. 1 , August 23, 2011 (Postal Service Response to CHIR No. 1), question 1 *available at* <http://www.prc.gov/Docs/75/75047/Resp.ChIR.1.pdf>.

refinements to the DOIS address the issues raised related to clockring errors?⁴

- How would differences between actual clocked employee hours and the employee schedule hours entered in the DOIS appear (or be detectable) in the DOIS database? Would a “user-neglect” example include managers not changing an employee’s assigned schedule in both DOIS and TACS?⁵
- As the Scoping Study notes, the Form 3999 data set contains the expected number of “unusual observations” or “outliers,” but there appear to be very few clearly “erroneous observations.”⁶ Please describe in more detail the “expected number” of unusual observations as it relates to the Form 3999 database.⁷
- Is the Postal Service planning on continuing with its quality analysis⁸ beyond the Scoping Study results? If no additional data quality controls are planned, a more detailed description of the data cleansing processes and documentation as it develops would be informative.⁹

⁴ “Operational clockring errors occur when a carrier has clocked time to an unscheduled route in the delivery unit, has clocked time to an unknown route and is assigned to the delivery unit, or has not clocked time to a scheduled assignment.” See DOIS Presentation, May 30-31, 2003, at 5, *available at* <http://www.nalc3825.com/doisclass.pdf>; *see also* Quality Control Tools: “Clockring Discrepancy Report, Miscellaneous Workload Status Report, Work Hour Discrepancy Report and FLASH Statistics Worksheet Report. *Id.* at 10.

⁵ United States Postal Service Office of the Inspector General, City Letter Carrier Operations Office Time Processes, Audit Report Number DR-AR-08-013, September 30, 2008 *available at* http://www.uspsoig.gov/FOIA_files/DR-AR-08-013.pdf. One entire Postal Area decided that requiring these schedule hours adjustments in both DOIS and TACS is redundant and not necessary, and they would also support an upgrade to DOIS that includes a direct feed from TACS to DOIS to record overtime authorization. *Id.* at 3.

⁶ Scoping Study at 12.

⁷ As the Commission stated in its Opinion and Recommended Decision in Docket No. R2005-1, “[e]conometric best practices don’t provide much in the way of guidelines for screening of data sets for errors. However, it would be highly unusual for an econometrician to feel comfortable using a dataset containing errors that accounted for between 5-40% of non-missing observations.” See R2005-1, Opinion and Recommended Decision, Appendix I, at 34, November 1, 2005.

⁸ The Postal Service notes that the DOIS collected data have some significant limitations and that “[t]he data collected are operational data and are not routinely subject to the high level of data accuracy checks associated with Commission standards. Thus a quality analysis of the data would have to be undertaken and, if necessary, additional data quality procedures would have to be implemented.” See Postal Service Response to CHIR No. 1, question 1.

⁹ There are a number of quality control procedures that appear to be available within DOIS that could possibly be used to screen incorrect DOIS data. Other data quality indicators (potential screeners) may

- Would the differences in cased mail procedures between DOIS units and non-DOIS units have an impact on the cased mail discrepancies shown between the City Carrier Cost Study (CCCS) and DOIS?¹⁰ Please discuss the measurement differences in reporting of Linear Volumes for DOIS vs. Non-DOIS Units.¹¹

4. Other Analytical Considerations.

- Has the Postal Service yet considered additional route and delivery type information for street time modeling (e.g., residential, business route)? Does this appear to be feasible with the Form 3999 database?
- Has the Postal Service yet considered evaluating model results using disaggregated cased volume?

be the difference between the projected and actual hours, street variance, and large differences in the “percent-to-standard.” See DOIS Training Presentation at slides 32 and 63 *available at* http://www.branch38nalc.com/sitebuildercontent/sitebuilderfiles/DOIS_Training_Slideshow.ppt

¹⁰ See Scoping Study at 21.

¹¹ DOIS-units appear to use a Data Collection Device (DCD) which electronically uploads the keypunched totals into DOIS. For the non-DOIS units (when a DCD is not available), employees appear to record manual volumes on a Postal Service Form (3921) and then are required to manually enter it into DOIS. See *also* United States Postal Service Office of Inspector General, Mail Volume Measurement for City Delivery Carriers – Greater Indiana District, Report Number DR-AR-11-005, June 29, 2011 at 4, *available at* http://www.uspsoig.gov/foia_files/DR-AR-11-005.pdf